217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

ExxonMobil Oil Corporation
Attn: Fred D. Herman, Terminal Superintendent
12909 High Road
Lockport, Illinois 60441

Application No.: 95090243 I.D. No.: 197810AAL
Applicant's Designation: Date Received: September 8, 1995
Operation of: Petroleum Bulk Terminal
Date Issued: November 8, 2002 Expiration Date[2]: November 8, 2007
Source Location: 12909 High Road, Lockport, Will County
Responsible Official: Fred D. Herman, Terminal Superintendent

This permit is hereby granted to the above-designated Permittee to OPERATE a petroleum bulk terminal, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: December 1, 2004
Revision Date Issued: March 8, 2005
Purpose of Revision: Administrative Amendment

This administrative amendment corrects the spelling of ExxonMobil (no space between the words) and also changes the responsible official.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued November 8, 2002 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

ExxonMobil Oil Corporation - Lockport Terminal
12909 High Road
Lockport, Illinois 60441
630/243-2371

ID No.: 197810AAL
Standard Industrial Classification: 5171, Petroleum Bulk Plants & Terminals

1.2 Owner/Parent Company

ExxonMobil Oil Corporation
3225 Gallows Road
Fairfax, Virginia 22037-0001

1.3 Operator

ExxonMobil Oil Corporation
12909 High Road
Lockport, Illinois 60441

Fred D. Herman
810/225-7488

1.4 General Source Description

The ExxonMobil Oil Corporation - Lockport Terminal is located at 12909 High Road, Lockport, Will County. The source is a bulk petroleum terminal for various petroleum products. Materials are transferred to the terminal by pipeline and by truck where they may be temporarily stored at the source prior to shipment of the material to different destinations via the pipeline, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading/unloading rack is used to transfer petroleum products from/to the source and to/from the trucks.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual Cubic Feet per Minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
bbl	Barrels (US Petroleum)
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft^3	Cubic Feet
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IFR	Internal Floating Roof
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kPa	Kilopascals
kW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
m^3	Cubic Meters
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
mm Hg	millimeter Mercury
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
RMP	Risk Management Plan

SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compound
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TPS	Tons Per Season
USEPA	United States Environmental Protection Agency
VCU	Vapor control Combustion Unit
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt.	Weight
yr	Year

3.0 INSIGHNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

500 Gallon Meter Proving Tank

Stormwater Discharges

Emergency Wastewater Spill Underground Storage Tank

Fugitive VOM emissions from leaking equipment components, such as piping, valves, pumps, and flanges

Fugitive PM emissions from vehicular traffic on paved roads.

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type

addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Dates of Construction	Emission Control Equipment
Group 1 Storage Tanks[1]	Nine (9) Existing External Floating Roof Storage Tanks (8 with Geodesic Dome Covers)	1972	Floating Roof with Primary Seal and Rim-Mounted Secondary Seal, Permanent Submerged Loading
Group 2 Storage Tank[1]	Existing Internal Floating Roof Storage Tank	1997	Floating Roof with Liquid Mounted Primary Seal, Permanent Submerged Loading
Tank Truck Loading/ Unloading Rack (LR-1)	Three Bay Petroleum Product Truck Loading and Unloading Rack	1997	Vapor Combustion Unit (VCU-1)

[1] See Attachment 1 for storage tank details

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 25 miles per hour (40 kilometers per hour), pursuant to 35 IAC 212.301 and 212.314.

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent into the atmosphere from any emission unit, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Vapor Pressure Operating Requirements

Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:

a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and

b. Ethanol blend gasoline shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.

5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to

address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have an Episode Action Plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.8 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of

the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicable Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR 63, Subpart R because the source is not a major source of HAPs. (See also Condition 5.5.)

5.4 Source-Wide Operational and Production Limits and Work Practices

5.4.1 The Permittee shall inspect pumps and compressors for leaks on at least a quarterly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. This requirement provides the basis for determining compliance with 35 IAC 218.142, as noted in Condition 5.10.

5.4.2 During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding all emission unit emissions. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	65.45
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO_x)	4.17
HAP, not included in VOM or PM	---
Total	69.62

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material (OM) emissions for each organic liquid and the OM emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected storage tanks are subject to the following pursuant to Section 39.5(7) of the Act.

i. Emissions from storage of material including roof landing losses, by category of service, shall not exceed the following limits:

Service	VOM Emissions (T/Mo)	(T/Yr)
Gasoline	2.50	14.98
Distillate Oil	----	0.25
Other (Ethanol, Additive, Product Water/Mixture)	----	0.32
	Total:	15.55

ii. Fugitive emissions of VOM from leaking components (valves, pumps, flanges, etc.) associated with storage tanks shall not exceed 0.48 tons/year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

b. The above limitations were established in Permit 03060042, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification

addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. This limit was placed here as it is a limit for all storage including some classified as insignificant emission units in Section 3 of this permit and also in Sections 7.1 and 7.2.

d. Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b)(10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 General Records for Storage Tanks

a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1 or 7.2 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(l)(i)(A) of the Act.

b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m^3 (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.

i. The date* on which construction of the tank commenced, with a copy of supporting documentation;

ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, commenced on the tank, if applicable;

iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and

iv. The dimensions of the tank and an analysis of capacity, if the tank was constructed, modified, or reconstructed after July 23, 1984. [40 CFR 60.116b(b)]

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.2 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

a. The color of each storage tank;

b. The condition of each storage tank; and

c. The type and number of fittings, or a statement that the default settings regarding type and number of fittings in the TANKS program are used for emission estimation.

5.6.3 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to allow verification that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63 Subpart R and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:

a. The Permittee shall maintain the following general records:

i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;

ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey;

iii. A copy of the supporting documentation for HAP vapor weight percent; and

iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids to the extent that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.

b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:

i. The throughput of each organic liquid through each tank or group of tanks if based on 5.6.3(a)(iv);

ii. The volatile organic material (VOM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program. This includes some insignificant emission unit tanks in Section 3 of this permit in order to verify the limit in Condition 5.5.3(a);

iii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, tons/month, with supporting calculations; and

iv. Total emissions of all combined HAPs from the source, tons/month, with supporting calculations.

5.6.4 Records for Operating Scenarios

N/A

5.6.5 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

a. A list, summary description, or diagram(s) showing the location of all pumps and compressors in gasoline service at the facility.

b. The performance of all inspections or other observations identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;

c. The condition, i.e., idle or operation, of each piece of equipment, pump or compressor inspected;

d. The presence of a leak, if detected, with description and the means of identification;

e. The date the leak was repaired, or the component taken out of service, if required; and

f. If a corrective action was needed, as in Condition 5.4, but was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.6 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

a. Reid vapor pressure of each gasoline or ethanol blend shipment;

b. Quantity of each gasoline or ethanol blend shipment; and

c. Date of delivery of each shipment.

5.6.7 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emission Report (Condition 9.7).

a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all); and

b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

5.7.2 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

VOM emissions exceeding the limits in Condition 5.5.3(a).

5.8 General Operational Flexibility/ Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 and the use of USEPA approved emissions estimating guidance.

a. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.

b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.

i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source’s next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 113 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 12.7523 tons per season.

This determination includes the use of 1995 and 1996 as baseline seasons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period during issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Group 1 Storage Tanks - Existing external floating roof storage tanks required to have a rim-mounted secondary seal

7.1.1 Description

The Permittee operates external floating roof storage tanks that are required to have a rim-mounted secondary seal to store various petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Units and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
TK 901	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 902	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 903	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 904	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 905	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 906	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 907	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe

Storage Tank	Description	Emission Control Equipment
TK 908	External Floating Roof Tank with Geodesic Dome Cover	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
TK 909	External Floating Roof Tank	Floating Roof, Metallic-Shoe Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe

7.1.3 Applicability Provisions

An "affected tank" for the purpose of these unit-specific conditions, is a storage tank that is only subject to 35 IAC 218.121, 218.122(b), 218.123, and 218.124. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), equipped with an external floating roof is subject to the requirements of 35 IAC 215.124(a) unless it is exempted pursuant to 35 IAC 218.124(b). A tank may be permanently exempt based on applicability of a NSPS. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3 °K (70 °F).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The status of all storage tanks at this source, including affected tanks which are subject to 35 IAC 218.124(a), is summarized in Attachment 1.

7.1.4 Non-Applicability of Regulations of Concern

a. The affected tanks are not subject to the requirements of 35 IAC 218.120, 218.127, 218.128, and 218.129, because the affected tanks are used solely for the storage of petroleum liquids, pursuant to 35 IAC 218.119(e).

b. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for petroleum liquids, 40 CFR Part 60, Subpart K, Ka, or Kb, because the affected tanks were constructed prior to June 11, 1973 and have not been modified since that date.

c. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control

measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.1.5 Control Requirements

Each affected tank shall be equipped with the following:

a. A floating roof which rests on the surface of the VPL that is equipped with a primary seal [35 IAC 218.121(b)(1)];

b. A floating roof that is equipped with a continuous seal extending from the floating roof to the tank wall (rim-mounted secondary seal) [35 IAC 218.124(a)(1)] (The Illinois EPA has not approved use of other equivalent equipment in lieu of a rim-mounted secondary seal.);

c. All drains (for drainage of rainwater, also known as "stub drains") in the floating roof deck shall be provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening [35 IAC 218.124(a)(3)];

d. All openings of the floating roof deck, other than drains, shall be equipped with projections into the tank which remain below the liquid surface at all times except when supported on the roof legs and be equipped with covers, lids or seals [35 IAC 218.123(b)(3) and 218.124(a)(4)]; and

e. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected tanks are subject to the following:

a. Volatile organic material emissions from the working and breathing losses of storage tank 908 shall not exceed 1.8 tons/year.

b. The above limitations were established in Permit 95090142, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.1.7 Operating Requirements

a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:

i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)];

ii. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall [35 IAC 218.124(a)(2)(A)];

iii. The accumulated area of gaps exceeding 0.32 centimeter (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inch per foot of tank diameter) [35 IAC 218.124(a)(2)(B)]; and

iv. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:

A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];

B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and

C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b)(3)(C)].

b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].

7.1.8 Inspection Requirements

a. The Permittee shall inspect each affected tank semiannually, the first inspection being conducted prior to May 1 of each year, to insure compliance with the applicable control and operating requirements [35 IAC 218.123(b)(4) and 218.124(a)(5)].

b. Secondary Seal Gap Inspections

i. The Permittee shall measure the secondary seal gap of each affected tank prior to May 1 of each year (and within 30 days of a written request to demonstrate compliance with the requirements of 35 IAC 218.124(b)). This measurement shall be conducted in accordance with the methods and procedures specified in 40 CFR 60, Subpart Kb [35 IAC 218.124(a)(6)]

ii. Prior notification for the above measurements in Condition 7.1.8(b)(i) shall be given to the Illinois EPA as specified in Condition 7.1.10(a).

c. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tanks to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 218.123(b)(6) and 218.124(a)(7):

i. A list of the types of volatile petroleum liquid stored on a monthly basis;

ii. The maximum true vapor pressure of each type of liquid as stored, psia;

iii. The results of any inspections or measurements required by the Condition 7.1.8(a), (b) and/or (c), including:

A. Identification of the affected tank and type of inspection;

B. When the inspection and/or measurement was performed;

C. Who performed the inspection and/or measurement;

D. The method of inspection and/or measurement;

E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and

F. Summary of compliance, including recommended corrective actions if appropriate.

b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.1.8(c) (Cover and Seal Inspection) [35 IAC 218.123(b)(6)]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

c. The throughput of storage tank 908, gal/mo and gal/yr; and

d. The monthly and aggregate annual VOM emissions from storage tank 908 based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA, Compliance Section and Regional Field Office, at least 30 days before the planned performance of all seal gap measurements, so the Illinois EPA may observe the measurements.

b. Notify the Illinois EPA within 5 days of becoming aware of storage of VPL in an affected tank not in compliance with the control requirements due to absence of one of the features required by Condition 7.1.5 (e.g., "no rim-mounted secondary seal,") status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

c. Notify the Illinois EPA within 30 days of becoming aware of any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.1.5) due to damage, deterioration, or other condition of the tank. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

d. Emissions of VOM from storage tank 908 in excess of the limitations specified in Condition 7.1.6(a) within 30 days of a record showing such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

a. Changes in the material stored in a tank. The Permittee is authorized to store materials with a vapor pressure less than 1.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.1 of this permit applicable to such tank based on the storage of VPL shall no longer apply. [35 IAC 218.121]

b. If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 1.5 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

c. Upon resuming storage of VPL in the affected tank, the applicable unit specific conditions of Section 7.1 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct appropriate inspection of the tank for storage of VPL. [35 IAC 218.123]

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Emissions from the affected storage tanks shall be determined through the use of the same version of the TANKS program used for the ERMS baseline determination. Annual total emissions from the affected storage tanks shall include those emissions produced whenever the affected storage tank is emptied and degassed.

7.2 Unit: Group 2 Storage Tank

7.2.1 Description

The Permittee operates an existing internal floating roof storage tank equipped with a liquid-mounted primary seal to store ethanol. Permanent submerged loading must be used for this tank, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Units and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
TK 910	Internal Floating Roof Tank	Floating Roof, Liquid-Mounted Seal, and a Permanent Submerged Loading Pipe

7.2.3 Applicability Provisions

a. The "affected tank" for the purpose of these unit-specific conditions, is an internal floating roof liquid storage tanks, used for the storage of an organic liquid with a maximum true vapor pressure equal to or greater than 3.5 kPa (0.5 psia) but less than 76.6 kPa (11.1 psia), with a design storage capacity greater than 151 m^3 (40,000 gallons), for which construction, reconstruction, or modification commenced after July 23, 1984, that is subject to the control requirements of 35 IAC 218.122(b) and 40 CFR Part 60, Subpart Kb, that relies on a permanent submerged loading pipe and an internal floating roof for compliance. The status of this affected storage tank at this source is summarized in Attachment 1.

b. The affected tank in this section is subject to 40 CFR Part 60, Subpart Kb, and hereby shielded from compliance with 35 IAC 218.119, 218.120, 218.121, 218.127, 218.128, and 218.129. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR Part 60, Subpart Kb, assures compliance with the applicable portions of 35 IAC 218.119, 218.120, 218.121, 218.127, 218.128, and 218.129.

7.2.4 Non-Applicable Regulations

a. This permit is issued based on the affected tanks not being subject to 35 IAC 218.123(b), because the affected tanks are subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR Part 60, Subpart Kb, pursuant to 35 IAC 218.123(a)(5).

b. This permit is issued based on the affected tanks not being subject to 35 IAC 218.124, because the affected tank is not equipped with an external floating roof.

c. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.2.5 Control Requirements

a. Each affected tank shall comply with the requirements of 40 CFR 60.112B(a)(1)(i), which requires the use of a fixed roof in combination with an internal floating roof that is equipped with one of the following closure devices:

i. A foam-filled or liquid-filled liquid-mounted seal;

ii. Two continuous seals; or

iii. A mechanical shoe seal.

b. The affected tank shall also be equipped with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b).

7.2.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source-wide emissions limitations in Conditions 5.5.2 and 5.5.1 that include this unit.

7.2.7 Operating Requirements

Each affected tank shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a)(1) and 60.113b(a), as follows:

a. The internal floating roof shall float on the liquid surface at all times, except during initial fill and during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of filling, emptying or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a)(1)(i)]

b. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]

c. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]

d. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]

e. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer=s recommended setting. [40 CFR 60.112b(a)(1)(vi)]

f. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]

g. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]

h. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]

i. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]

j. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off. [40 CFR 60.113b(a)(3)(ii) and (a)(4)]

7.2.8 Inspection Requirements

The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for affected tank equipped with an internal floating roof as follows:

a. Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once ever 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must repair or otherwise remove the storage tank from service. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]

b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage tank is emptied and degassed (Out-of-Service Inspection) to detect if the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area. If any of these conditions are detected during inspections, the Permittee shall repair the items prior to refilling the storage tank with petroleum liquid. These inspections shall be performed at least every 10 years [40 CFR 60.113b(a)(4)].

c. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each affected tank for which an inspection is required by Condition 7.2.8(a) and (b) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by Condition 7.2.8(b) is not planned and the owner or operator could not have known about the inspection 30 days in advance, notify the Illinois EPA at least 7 days prior to refilling of the tank. [35 IAC 218.127(a)(5)]

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Conditions 5.5.1 and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

a. Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.2.8(a) and (b). [40 CFR 60.115b(a)(2)]

i. I.D. of the storage vessel and date the inspection was performed;

ii. Who performed the inspection;

iii. The method of inspection;

iv. The observed condition of each feature of the storage vessel (seals, internal floating roof, and fittings), with the raw data recorded during the inspection; and

v. Summary of compliance.

b. The Permittee shall maintain Out-of-Service Inspection records that are sufficient to identify whenever the tank is emptied and degassed for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect to demonstrate compliance with Condition 7.2.8(b).

Note: Normal operation of the tank includes all operations for which the tank is designed and permitted including periods when empty and not opened and degassed for access, i.e., awaiting service.

c. The Permittee shall keep the operating records for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe

the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall submit written notifications and reports to the Illinois EPA, Compliance Section as required by the NSPS, for the affected tank, as follows:

A report identifying any deficiencies or shortcomings identified in the Annual Inspection required by Condition 7.2.8(a) or an Out-of-Service Inspection within 30 days of inspection. This report shall include the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair(s) were made. [40 CFR 60.115b(a)]

b. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5, e.g., no "secondary seal", within five days of becoming aware of the deviation status. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps to be taken to avoid future deviation.

c. Any storage of VOL in an affected tank that is not in compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the deviation status. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps to be taken to avoid future deviation.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Emissions from the affected storage tank shall be determined through the use of the same version of the TANKS program used for the ERMS baseline determination. Annual total emissions from the affected storage tank shall include those emissions

produced whenever the affected storage tank is emptied and degassed.

7.3 Unit: Truck Loading/Unloading Rack
Control: Vapor Combustion Unit

7.3.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products and additives. The Permittee operates a loading rack that consists of three bays that include a total of four loading points. The VOM emissions from the truck loading/unloading rack occur when material is loaded into delivery vehicles. A vapor control combustion unit (VCU) is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc. associated with the truck loading stations.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Loading/ Unloading Rack LR-1	Three Bay Loading Rack Used for Loading/Unloading Various Petroleum Products Into/From Tank Trucks	Vapor Control Combustion Unit VCU-1	August 1997

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected loading rack," for the purpose of these unit specific conditions, is a loading rack subject to the requirements of 40 CFR 60 Subpart XX and 35 IAC 218.582 and relies on a VCU for compliance. For purposes of 40 CFR 60 Subpart XX, a "gasoline tank truck" is a delivery vessel used at bulk gasoline terminals which is loading gasoline or has loaded gasoline on the immediately previous load. Each loading rack used to transfer gasoline into a gasoline tank truck from any bulk gasoline terminal is subject to the requirements of 35 IAC 218.582 and 218.585. Loading racks constructed or modified after December 17, 1980 are subject to the requirements of 40 CFR 60 Subpart XX.

All affected loading racks in this section are hereby shielded from compliance with 35 IAC 218.122. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR Part 60,

Subpart XX, assures compliance with 35 IAC 218.122 following the review of requirements of 40 CFR Part 60, Subpart XX, and 35 IAC 218.122.

b. There are also source wide regulation applicability limitations in Condition 5.2.2 that include this unit.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

7.3.4 Non-Applicability of Regulations of Concern

The affected truck loading/unloading rack is not subject to 35 IAC Part 218, Subpart TT, because it is subject to 35 IAC 218, Subpart Y. [35 IAC 218.980(a) and (b)]

7.3.5 Operational and Production Limits and Work Practices

a. At all times, the Permittee shall maintain and operate the truck loading rack, including the vapor control combustion system, in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d)]

b. Vapor collection systems used to control TOC emissions from affected loading racks shall be designed and operated to prevent any TOC vapors collected at one affected loading rack from passing to another affected loading rack. [40 CFR 60.502(d)]

c. The Permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]

d. The Permittee shall act to assure that each affected loading rack and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. [40 CFR 60.502(g)]

e. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a)(3)]

f. An affected loading rack and associated vapor collection system shall be designed and operated to prevent gauge pressure in the gasoline tank truck from exceeding 4,500 pascals (450 mm of water) during product loading. [40 CFR 60.502(h)]

g. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C)]

h. No pressure-vacuum vent in an affected loading rack's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]

i. All loading and vapor return lines shall be equipped with fittings which are vapor tight. [35 IAC 218.582(a)(4)]

j. The current VCU is programmed to light when loading rack operation is initiated. An affected loading rack must be shut down and not allow loading if the VCU combustion flame does not initiate or is not maintained during loading. The temperature controller set point of the vapor collection/ combustion system of an affected loading rack shall be maintained at the manufacturer's recommended temperature.

k. All loading of liquid product into gasoline tank trucks at an affected loading rack shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502:

    i. The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck. [40 CFR 60.502(e)(1)]

    ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded. [40 CFR 60.502(e)(2)]

    iii. The Permittee shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. [40 CFR 60.502(e)(3)]

    iv. The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank

truck loaded at the terminal within three weeks after the loading has occurred. [40 CFR 60.502(e)(4)]

v. The Permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the terminal until vapor tightness documentation for that tank truck is obtained. [40 CFR 60.502(e)(5)]

l. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3), and the delivery vessel meets the following requirements [35 IAC 218.582(a)(5) and 218.584(a)]:

i. Includes a vapor space connection that is equipped with fitting(s) which are vapor tight;

ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;

iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;

iv. Is designed and maintained to be vapor tight at all times during normal operations;

v. Is not refilled in Illinois at other than:

A. Bulk gasoline terminals that comply with the requirements of 35 IAC 218.582; or

B. Bulk gasoline plants that comply with the requirements of 35 IAC 218.581(b).

vi. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:

A. A pressure drop of no more than three inches of water in five minutes; and

B. A vacuum drop of no more than three inches of water in five minutes.

m. The vapor control combustion unit temperature controller set point shall be maintained at the manufacturer's recommended temperature but not lower than 1400°F.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected loading rack is subject to the following:

a. Gasoline shall only be loaded out through the truck loading rack, using submerged loading, and only with the vapor control combustion system properly operating.

b. i. Loadout of gasoline by the terminal loading rack shall not exceed 42,000,000 gallons per month and 307,500,000 gallons per year.

ii. Loadout of distillate oil by the loading rack shall not exceed 15,000,000 gallons/month and 100,000,000 gallons/year.

c. The total organic emissions from the vapor collection system shall not exceed 10 milligrams per liter of gasoline loaded. Compliance with this requirement shall be determined by emission testing, inspections and recordkeeping in accordance with Conditions 7.3.7, 7.3.8 and 7.3.9.

d. i. Emissions from the loading rack shall not exceed the following limits:

Service	VOM Emissions (T/Mo)	(T/Yr)
Gasoline Loading	1.85	12.83
Distillate Loading	0.11	0.71
Fugitives	----	10.26
	Total:	23.80

ii. Emissions attributable to combustion of fuel in the vapor collection system shall not exceed the following limits:

Pollutant	Emissions (T/Mo)	(T/Yr)
Nitrogen Oxides	1.00	6.80
Carbon Monoxide	2.40	17.00

e. The above limitations were established in Permit 03060042, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. These limits supersede the limits in Permit 95090142 [T1].

f. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.3.7 Testing Requirements

Upon written request by the Illinois EPA, pursuant to 35 IAC 218.105(d)(1) and Section 39.5(7)(b) of the Act, the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified below (see also 35 IAC 218.105(f)):

a. Volatile Organic Material Gas Phase Source Test Methods The methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies [35 IAC 218.105(f)].

i. CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times [35 IAC 218.105(f)(1)].

ii. 40 CFR Part 60, Appendix A, Method 1 or 1A shall be used for sample and velocity traverses [35 IAC 218.105(f)(2)].

iii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D shall be used for velocity and volumetric flow rates [35 IAC 218.105(f)(3)].

iv. 40 CFR Part 60, Appendix A, Method 3 shall be used for gas analysis [35 IAC 218.105(f)(4)].

v. 40 CFR Part 60, Appendix A, Method 4 shall be used for stack gas moisture [35 IAC 218.105(f)(5)].

vi. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4 shall be performed, as applicable, at least twice during each test run [35 IAC 218.105(f)(6)].

vii. Use of an adaptation to any of the test methods specified in Conditions 7.3.7(a)(i), (ii), (iii), (iv), (v) and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified in Conditions 7.3.7(a)(i), (ii), (iii), (iv), (v) and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) will yield inaccurate results and that the proposed adaptation is appropriate [35 IAC 218.105(f)(7)].

b. Notwithstanding other requirements of 35 IAC Part 218, upon request of the Illinois EPA where it is necessary to demonstrate compliance, an owner or operator of an emission unit which is subject to 35 IAC Part 218 shall, at his own expense, conduct tests in accordance with the applicable test methods and procedures specific in this Part. Nothing in this Condition (see also 35 IAC 218.105) shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing [35 IAC 218.105(i)].

7.3.8 Monitoring Requirements

a. Each calendar month, the vapor collection/combustion system and each affected loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for TOC liquid or vapor leaks. The detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]

b. The VCU combustion flame shall be present at all times when loading occurs and shall be monitored using a thermocouple or equivalent device to detect the presence of a flame. An affected loading rack must be shut down and not allow loading if a flame is not detected in the associated VCU system.

c. The VCU system of an affected loading rack shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the VCU system temperature.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of the efficiency of each capture system and control device pursuant to Condition 7.3.7, which include the following [Section 39.5(7)(e) of the Act]:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

b. General Recordkeeping

i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;

ii. The amount of each organic liquid distributed through each affected loading rack, barrels per month and barrels per year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (running twelve month total);

iii. Emissions of VOM, tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VCU as demonstrated in the

most recent test, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (running twelve month total);

iv. Emissions of NO_x and CO tons/month and tons/year, with supporting calculations, calculated utilizing the compliance procedure specified in Condition 7.3.12(c), with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (running twelve month total) in order to verify the limit in Condition 7.3.6(d)(ii).

c. Records of Operations

The Permittee shall maintain records of the following for loading rack (LR-1) and associated vapor combustion unit (VCU-1) to demonstrate compliance with Conditions 7.3.5 and 7.3.6:

i. The use of an affected loading rack for loading of any gasoline tank truck when there was no flame present in the associated VCU or when the VCU was not operating at the appropriate temperature, including:

A. The date and time of the loading;

B. The specific problem with the VCU or flame monitor;

C. Type of material loaded; and

D. The reason that loading occurred even though the VCU did not have a combustion flame or was not operating at the appropriate temperature;

ii. The use of an affected loading rack for the loading of any non-vapor-tight gasoline tank (one not meeting the requirements of Condition 7.3.5(k)) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.3.5(l)), including:

A. The date and time of the loading;

B. The specific reason the vessel did not meet the requirements of Condition 7.3.5(k) or (l);

C. Type of material loaded; and

D. The reason why loading was allowed.

d. Records of Inspections

The Permittee shall keep the following records for each affected loading rack and associated VCU which delivers liquid product into gasoline tank trucks.

A record of each monthly leak inspection required under 40 CFR 60.502(j) (Condition 7.3.8) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

i. Date of inspection;

ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);

iii. Leak determination method;

iv. Corrective action, including the date each leak was repaired and the reasons for any repair interval in excess of 15 days; and

v. Name and signature of the person that performed the inspection.

e. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal:

i. The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) (Condition 7.3.5(k)(i));

ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:

A. Test title: Gasoline Deliver Tank Pressure Test – EPA Reference Method 27;

B. Owner name and address;

C. Tank identification number;

D. Testing location;

E. Date of test;

F. Tester name and signature;

G. Witnessing inspector, if any: name, signature, and affiliation; and

H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).

iii. The Permittee shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) (Condition 7.3.5(k)(iv)) on file at the terminal.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected loading rack with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.3.5(k) or (l), including:

i. The date and time of the loading;

ii. The specific reason the vessel did not meet the requirements of Condition 7.3.5(k) or (l);

iii. Type of material loaded; and

iv. The reason why loading was allowed.

b. Any use of an affected loading rack when there was no flame present/detected in the associated VCU, or the VCU was not operating at the appropriate temperature, including:

i. Date and time of occurrence;

ii. Specific problem associated with the VCU, flame monitor, or other equipment;

iii. Type of material being loaded;

iv. Reason why loading continued; and

v. Supporting data, i.e., strip chart or disk.

c. Summary of times when the continuous temperature indicator and/or strip chart recorder of disk storage was not functioning, including:

i. Date and time of each occurrence; and

ii. Specific problem associated with the indicator or recording equipment.

d. Notification within 15 days of operation of loading rack (LR-1) and/or associated vapor combustion unit (VCU-1) in excess of the emissions limitations of Condition 5.5.1 or 7.3.6;

e. Notification within 30 days of operation of the affected loading rack in excess of the throughput limitations of Condition 7.3.6(b) or emission limits of Condition 7.3.6(d).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

a. The Permittee may use the documentation prepared pursuant to the annual tank truck certification testing required under 40 CFR 63 Subpart R. Based upon a review of the requirements under 40 CFR 63 Subpart R, i.e., the annual certification testing (40 CFR 63.425(e)) and recordkeeping requirements (40 CFR 63.428(b)(3)f), has been deemed as stringent as that required under 35 IAC 218.584(d) and 40 CFR 60.502(e).

b. In response to failure or planned maintenance of the existing VCU, The Permittee may use a portable VCU for periods of up to 15 days to allow for the continued loading of gasoline, provided that the portable VCU has been guaranteed by the supplier to be equivalent in its destruction efficiency for VOM and have a monitoring system for determining the presence of a flame during gasoline loading. All requirements in Condition 7.3 will apply to the replacement portable VCU. Extensions beyond 15 days may be granted upon request from and approval by the Illinois EPA.

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

a. Compliance with Condition 7.3.3(c) is assumed by the work-practices inherent in operation of a petroleum products loading rack.

b. Compliance with the operational limitations of Condition 7.3.5 shall be demonstrated through the monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10.

c. Compliance with the NO_x emission limitations of Condition 5.5.1 shall be demonstrated by the summation of the monthly NO_x emissions and calculated using the throughput of the loading rack times the VCU manufacturer's guaranteed NO_x emission rate (4 mg/liter of gasoline loaded).

d. To determine compliance with Conditions 5.5.1 and 7.3.6, calculations of the VOM emissions from the affected loading rack shall be determined using the emission factors, formulas and procedures from Section 5.2, "Transportation and Marketing of Petroleum Liquids," AP-42, Volume I, Fifth Edition, January, 1995.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 9, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a

detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Storage Tank Features and Groupings

TABLE 1-1

Group/ Tank #	Storage Capacity (Barrels)	Tank Type	Primary Seal [1]	Secondary Seal	Products Stored	Maximum True Vapor Pressure (psia at 70°F)	Date Constructed
Group 1							
TK-901	151,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-902	54,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-903	97,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-904	81,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-905	43,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-906	121,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972

Group/ Tank #	Storage Capacity (Barrels)	Tank Type	Primary Seal [1]	Secondary Seal	Products Stored	Maximum True Vapor Pressure (psia at 70°F)	Date Constructed
TK-907	81,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-908	67,000	External Floating Roof with Geodesic Dome Cover	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
TK-909	5,000	External Floating Roof	Mech. Shoe	Rim-Mounted	Various Petroleum	12.5	1972
Group 2							
TK-910	5,483	Internal Floating Roof	Liquid Mounted		Ethanol	11.1	1997

[1] Use of equivalent emission control equipment is allowed without permit modification

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. <u>Significant Permit Modification</u>

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	**For Illinois EPA use only**
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents		
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering “No” to any of the above may result in the application being deemed incomplete.

Signature Block	
	This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ AUTHORIZED SIGNATURE _____ TITLE OF SIGNATORY _____ TYPED OR PRINTED NAME OF SIGNATORY _____ / _____ / _____ DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source’s CAAPP permit, if necessary.

10.5 Attachment 5 PRELIMINARY BASELINE EMISSIONS SUMMARY

Seasonal VOM emissions from units subject to further reduction, in TPS:

Emission Unit	Proposed	Illinois EPA Determination	Notes
Tank 901	1.2765	1.2765	
Tank 902	0.7234	0.7234	
Tank 903	1.0299	1.0299	
Tank 904	1.7804	1.7804	
Tank 905	0.6130	0.6130	
Tank 906	0.0890	0.0890	
Tank 907	0.0285	0.0285	
Tank 908	0.0163	0.0163	
Tank 909	0.3392	0.3392	
Tank 910	0.0583	0.0583	
Tank A-Dis	0.0040	0.0000	1
Tank A-Gen	0.0033	0.0000	1
Tank A-MBL	0.0044	0.0000	1
Tank W-1	0.0248	0.0000	1
Loading Rack	12.2740	6.7978	2
Total:	18.2650	12.7523	

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU's equals 1 ton.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 2002 seasonal allotment period May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year pursuant to 35 IAC 205.300.

Notes: 1 Treated as insignificant activities in the CAAPP and are not included in the baseline.

2 Modified to reflect VOM emissions actually generated during the ozone season.

TOTAL SOURCE ALLOTMENT = 0.88 x 12.7523 = 11.2220

OR 113 ATU

DGP:jar

10.6 Attachment 6 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292?CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

DGP:psj

10.7 Attachment 7 – VOM Netting for 2003 Throughput Increase

Nonattainment NSR Applicability - VOM Netting Analysis

Contemporaneous Time Period of 1999 Through 2003

Table I – Emissions Increases and Decreases Associated With The Proposed Modification

Item of Equipment	Past Actual* (Tons/Yr)	Future Potential (Tons/Yr)	Emissions Increase (Tons/Year)
Gasoline Storage Tanks	14.59	14.98	0.39
Distillate Storage Tanks	0.23	0.25	0.02
Ethanol Storage Tanks	0.15	0.21	0.06
Additive Storage Tanks	0.05	0.06	0.01
Product Water/Mixture Storage Tanks	0.01	0.04	0.03
Fugitives (Storage Tank Related)	0.48	0.48	0.00
Loading Rack (Distillate Service)	0.57	0.71	0.14
Loading Rack (Gasoline Service)	1.77	12.83	11.06
Loading Rack Fugitives	6.17	10.26	4.09
Total:	24.02	39.82	15.80

* The Past Actual emissions are calculated by taking the average of the emission data from the previous two calendar years.

Table II – Source-Wide Creditable Contemporaneous Emission Increases

Item of Equipment	Commencement of Operational Change Date	Emissions Increase (Tons/Year)	Permit Number
None			

Table III – Source-Wide Creditable Contemporaneous Emission Decreases

Item of Equipment	Commencement of Operational Change Date	Emissions Decrease (Tons/Year)	Permit Number
None			

Table IV – Net Emissions Change

	(Tons/Year)
Increases And Decreases Associated With Proposed Modification	15.80
Creditable Contemporaneous Emission Increases	0.00
Creditable Contemporaneous Emission Decreases	0.00
	15.80